

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRIDGESTONE SPORTS CO., LTD.,)	
and BRIDGESTONE GOLF, INC.,)	
)	
Plaintiffs,)	C.A. No. 05-132 (JJF)
)	
v.)	
)	
ACUSHNET COMPANY,)	
)	
Defendant.)	

**BRIDGESTONE'S ELEVENTH NOTICE
OF DEPOSITION PURSUANT TO RULE 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiffs Bridgestone Sports Co., Ltd. and Bridgestone Golf, Inc. ("Bridgestone") shall take the deposition upon oral examination under oath of Defendant Acushnet Company ("Acushnet") beginning at 9:00 a.m., on the 8th day of September, 2006, and continuing from day to day until completed, in the offices of Paul, Hastings, Janofsky & Walker LLP, 875 15th Street, NW, Washington, DC 20005, or at such other time and place as may be agreed upon by counsel. The deposition will be recorded by stenographic means and may be videotaped, and is being taken for the purposes of discovery, for use at trial, and for such other purposes as permitted under the Federal Rules of Civil Procedure.

In accordance with Rule 30(b)(6), Acushnet shall designate one or more officers, directors, managing agents, or other persons to testify on its behalf concerning the matters set forth in Attachment A hereto.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Leslie A. Polizoti

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August 24, 2006

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ATTACHMENT A

Notwithstanding any definition set forth below, each word, term, or phrase used in this Notice of Deposition is intended to have the broadest meaning permitted under the Federal Rules of Civil Procedure.

DEFINITIONS

As used herein, the following terms are to be interpreted in accordance with the DEFINITIONS set forth in Bridgestone's First Set of Requests For Production of Documents and Things (Request Nos. 1-100) as though fully set forth herein.

In addition, the following phrases in this Notice are to be interpreted in accordance with the following definitions:

1. The term "sample" or "samples" means any of the items produced by Acushnet marked AB0087866 through AB0087918 and / or corresponding or similar items in the control of Acushnet at any time.

2. The term "Acushnet golf ball" or "Acushnet golf balls" means any of Acushnet's Titleist® Pro V1™; Titleist® Pro V1x™; Titleist® Pro V1*; Titleist® NXT™; Titleist® NXT Tour; Titleist® DT So/Lo (PTO So/Lo); and Pinnacle ® Exception™ golf balls.

3. The term "material construction" means the relative amounts of respective raw materials.

MATTERS ON WHICH EXAMINATION IS REQUESTED

1. The actual composition and physical properties of each and every sample, including, but not limited to, their material, chemical and physical characteristics.
2. Acushnet's manufacturing guidelines and procedures for each sample, including and without limitation the manufacturing processes, material construction, chemical and physical characteristics of each and every sample.
3. The quality control and compliance employed by Acushnet in the design, preparation and manufacture of each and every sample.
4. The identification of each and every one of Acushnet golf balls for which each sample would be used, including, but not limited to, the sample marked AB0087870 which is not labeled, the sample marked AB0087875 and labeled "Fusabond," and the sample marked AB0087881 and labeled "EX Rubber."
5. The specific manner in which each and every sample would be used in the manufacturing of the Acushnet golf balls.
6. The manner in which Acushnet stores, manages and maintains its samples, including, but not limited to, physical location, length of time, temperature, air conditions, and method of packaging, and the manner in which Acushnet stored, managed and maintained the samples produced to Bridgestone, including, but not limited to, physical location, length of time, temperature, air conditions, and method of packaging.
7. The identity of each and every sample produced to Bridgestone, including, but not limited to, the date of manufacture, the storage conditions, the method of packaging, and the original size or volume of the batch the sample came from and how the remainder of that batch was utilized by Acushnet.

8. Any and all tests performed on the samples by Acushnet and the results thereof.

9. The manner, protocols, manuals, instructions, guidelines, methodology, machinery, standards and/or devices Acushnet uses to test each and every sample.

10. The identity of each person substantially involved in the conception, research, design, development, testing, quality control and compliance, and manufacture of each and every sample.

CERTIFICATE OF SERVICE

I, Leslie A. Polizoti, hereby certify that on August 24, 2006 I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Richard L. Horowitz, Esquire
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th floor
1313 N. Market Street
Wilmington, DE 19899

and that I caused copies to be served upon the following in the manner indicated:

BY HAND

Richard L. Horwitz, Esquire
Potter Anderson & Corroon LLP
1313 N. Market Street
Wilmington, DE 19801

BY FACSIMILE

Alan M. Grimaldi, Esquire
Howrey LLP
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/s/ Leslie A. Polizoti

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